

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
vs. ) NO. 04-30055-MAP  
 )  
KACEY JONES )

**MOTION FOR FUNDS (STATE COURT TRANSCRIPTS)**

Now comes the defendant and respectfully requests this Honorable Court allow him to expend \$690.00 for State court transcripts. The defendant specifically states these transcripts are relative to the testimony of Officer Michael Trombley testifying in a State court hearing on a Motion to Reconsider Dismissal of an Indictment based on his giving false testimony.

The defendant states this issue has been brought to the attention of the court as Officer Trombley is a key witness to the Government's case of showing the defendant possessed a firearm as alleged in the Federal indictments. This information would be used for potential impeachment of Officer Trombley.

Attached is a quote from the State court stenographers (Elizabeth Santos, Alicia Cayode) who would be asked to reproduce the transcripts. Michael Trombley's testimony was given on or about 12/7/05 in the State court hearing.

Respectfully submitted,

THE DEFENDANT

BY: /s/ Mark G. Mastroianni  
95 State Street - Suite 309  
Springfield, MA 01103  
(413) 7320-0222  
BBO #556084

CERTIFICATE OF SERVICE

I, Mark G. Mastroianni, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to Attorney Paul Smyth, 1550 Main Street, Springfield, MA 01103 this 9<sup>th</sup> day of May 2006.

\_\_\_\_\_/s/ Mark G. Mastroianni

**Official Court Reporter**

**327 Regency Park Drive, Agawam, MA 01001  
(413)748-7901**

**MARK MASTROIANNI  
95 STATE STREET  
SUITE 309  
SPRINGFIELD, MA 01103**

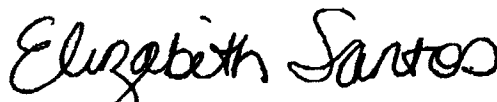
**May 9, 2006**

**COMMONWEALTH OF MASSACHUSETTS  
V.**

**JOSE CINTRON  
01-1032**

**MOTION TO RECONSIDER HELD ON  
12-2-05, 12-7-05, and 12-8-05**

The estimated cost of the transcripts about which you inquired recently is \$615.00 which is the cost of my portion of the transcript ,and Alicia Cayode-Kyles' cost is estimated at \$75 for a total of \$690. If you have any further questions, please let me know.



**Elizabeth Santos  
Official Court Reporter**